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October 24, 2017

BY ECF

The Honorable Ramon E. Reyes
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Shane Rhooms v. City of New York, et al.*, 11 CV 5910 (PKC)(RER)
Shane Rhooms v. Enright, et al., 13 CV 5006 (PKC)(RER)

Dear Magistrate Judge Reyes:

I represent the plaintiff in the above-referenced consolidated civil rights actions. I write with defense counsel's consent to request an enlargement of the schedule for pre-trial submissions. This is the first such request by plaintiff.

As an initial matter, per the final pretrial conference held on August 29, 2017, the parties' proposed Joint Pre-trial Order is due to Judge Chen on October 27, 2017; service of motions in limine must be completed by November 13, 2017; responses to motions in limine, including the filing of the motion on CM/ECF, are due by November 27, 2017; and the parties' proposed voir dire, special verdict sheet and jury charge are also to be filed on CM/ECF by November 27, 2017.

I now write to request that the deadlines be extended due to an unusually heavy docket since September of briefs due, including a number of summary judgment submissions and a Second Circuit filing, of trial preparation and filings, and numerous depositions and discovery cutoffs converging. Among other upcoming scheduling issues, I have federal trials scheduled in November, December, January and February. We are of course anxious to move this case to trial, and respectfully request that the Court so order the following proposed schedule:

- Deadline for plaintiff's portion of the JPTO to defendants: November 20, 2017
- Deadline for defendants' portion of the JPTO to plaintiff: December 20, 2017
- Deadline for filing of the proposed JPTO: December 27, 2017
- Deadline for filing of the parties' voir dire, special verdict sheet, and jury charge: December 27, 2017
- Service of motions in limine: January 19, 2018
- Service of responses to motion in limine, and for filing of fully briefed motions by CM/ECF (no replies): February 2, 2018

Thank you for your consideration.

Respectfully submitted,

s/ Brett Klein

Brett H. Klein

cc: Kimberly M. Joyce, Esq.